

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:21-CR-425 RWS-DDN
)	
JEFFREY DAVID REUTER,)	
)	
Defendant.)	

**EMERGENCY MOTION FOR NEW COUNSEL AND TO WITHDRAW
DEFENDANT’S MOTION TO DISMISS INDICTMENT AND TO SUPPRESS
EVIDENCE AND STATEMENTS, OR IN THE ALTERNATIVE, TO
CONTINUE THE EVIDENTIARY HEARING SET FOR NOVEMBER 15, 2021**

NOW COMES DR. JEFFREY REUTER (hereinafter the “Defendant), by and through his counsel, Assistant Federal Public Defender Mohammed G. Ahmed, stating the following:

- 1) On October 20, 2021, Defendant filed a Motion To Dismiss Indictment And To Suppress Evidence And Statements.
- 2) On or about November 5, 2021, Defendant faxed undersigned counsel a request to subpoena certain witnesses to appear at the evidentiary hearing scheduled for November 15, 2021.
- 3) On November 10, 2021, Defendant, undersigned counsel, and two others from counsel’s office working on Defendant’s case, held a zoom conference, in which counsel explained that he would not subpoena the requested witnesses for reasons that are privileged and confidential. During the zoom conference,

Defendant requested copies of certain documents, some of which were in counsel's possession and some of which were not.

4) On November 11, 2021, undersigned counsel visited Defendant in Crawford County Jail to bring him some of the requested documents and to discuss the upcoming evidentiary hearing. During the meeting, Defendant expressed dissatisfaction with the pace of the litigation, with counsel's failure to include certain arguments in the motion to suppress, and with the fact that counsel has not yet been able to obtain certain records and documents the Defendant has requested.

5) When counsel confirmed that pretrial motion litigation will slow down the case trajectory significantly because of the time associated with ordering the transcript of the evidentiary hearing; supplemental briefing; response briefing of the Government; and judicial decision-making, Defendant expressed his desire to cancel the evidentiary hearing and to simply demand that a jury trial commence as soon as possible.

6) Defendant also expressed a desire for new counsel as he is dissatisfied with the undersigned's performance thus far.

7) Counsel advised Defendant that it may not be in his best interest to forfeit substantive pretrial motions without consulting new counsel, if new counsel were to be appointed.

8) Due to the proximity to the scheduled evidentiary hearing, the undersigned requests an emergency or otherwise urgent hearing in this matter.

WHEREFORE, DR. JEFFREY REUTER requests new counsel and to withdraw Defendant's Motion To Dismiss Indictment and To Suppress Evidence and Statements, or in the alternative, to continue the evidentiary hearing set for November 15, 2021, until Defendant's request for new counsel can be resolved.

Dated: November 11, 2021

Respectfully submitted,

/s/ Mohammed G. Ahmed
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on November 11, 2021, the foregoing was filed with the Court's CM/ECF system to be served upon all attorneys of record for the United States Government.

/s/ Mohammed G. Ahmed
MOHAMMED G. AHMED
Assistant Federal Public Defender